




Curt Gardner  
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05/22/2007 01:21 PM

To Patricia Murrow/ARTD/R7/USEPA/US@EPA  
cc assem.abdul@dnr.mo.gov, darleen.groner@dnr.mo.gov  
bcc

Subject Summary Report of Incinerator Effluent Release

History:  This message has been replied to.

Please see attached the letter I sent to the MDNR regarding a leakage of "C" Incinerator effluent to the ground, occurring on May 7, 2007. Assem Abdul asked me to forward this to you.

Please accept my apologies for the late submittal to the EPA. If you have any questions, please contact me at the number below.

(See attached file: Incinerator C Effluent Release 5-7-07 MDNR.doc)

Curt Gardner, P.E.  
Team Member, EHS Central Hub  
BASF Corporation  
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Palmyra, MO. 63461-2611  
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curt.gardner@basf.com Incinerator C Effluent Release 5-7-07 MDNR.doc

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May 16, 2007

Certified Mail  
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Mr. Richard A. Nussbaum  
Permits Section Chief  
Hazardous Waste Program  
Missouri Department of Natural Resources  
Division of Environmental Quality  
P.O. Box 176  
Jefferson City, Missouri 65102-0176

Dear Mr. Nussbaum:

This is to notify the Department that the effluent line from our hazardous waste Incinerator "C" experienced a leak, resulting in the release of approximately 175 Lbs of aqueous incinerator effluent to the ground. Based on the "derived from" rule and reportable quantities attached to listed waste codes treated by the incinerator, this release was in excess of reportable quantity thresholds. This written submittal is for MDNR Incident No. 07-0507-0855 JAP, which was verbally reported to the MDNR Environmental Emergency Response Center Monday Morning, May 7, 2007.

Incinerator "C" effluent is principally a combination of quench water, scrubber water and inorganic salts resulting from the incineration of hazardous waste and flue gas scrubbing as permitted under BASF Corporation's Hannibal Permit MOD050226075. This effluent is routed from the incinerator and scrubber to the site's NPDES system via the effluent line. In the NPDES system, the incinerator effluent combines with other effluent streams, which are then collectively discharged to the Mississippi River under NPDES permit. Most of the Incinerator "C" effluent line runs over concrete containment, which would prevent any leaks from reaching the ground. However, a small segment of the line is over an uncontained gravel and dirt surface where it connects to the NPDES system.

On Monday morning, May 7, operating personnel noticed two small leaks on the effluent line over the uncontained portion of the piping. After discovering the leaks, operations proceeded to patch the line at the leakage points to stop the leaks, clean up the leakage and wetted gravel and sand, and place buckets under the section of line over the gravel area for containment in case of future leaks. Based on observations of the ground and observed leakage rate, it was estimated that approximately 20 gallons of aqueous effluent was released to the ground, which is approximately 175 Lbs. The cleaned up aqueous effluent was returned to the NPDES system, and the wetted gravel and sand will be disposed of as hazardous waste.

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Page 2

The leaked effluent composition and characteristics were not atypical, and are not considered to be contributing causes to the leaks. Rather, the causes of the leaks are believed to be the general age of the line and possibly some external abrasion from the gravel in contact with the line. Barring any unforeseen delays, this effluent line is to be replaced with a new line this summer during Incinerator "C" shutdown. BASF Corporation does not believe the leaked effluent presents any significant impact to human health or the environment. However, because the effluent is derived from the treatment of listed hazardous wastes, BASF must report the release as required under our RCRA permit.

If you have any questions with regard to this submittal or require any additional information, please contact me at 573-769-8684.

Sincerely,

BASF Corporation  
Hannibal Site

Curt Gardner, P.E.  
EHS Team Member

cc: Mr. Assem Abdul, Hazardous Waste Program, MDNR  
Ms. Irene Crawford, Director, MDNR NERO  
Ms. Nicole McGlone-Santistevan